

DECLARATION OF WILLIAM E. TAYLOR

ATTACHMENT A

REDACTED – FOR PUBLIC INSPECTION

## LOCAL COMPETITION IN GREENWICH AND BYRAM, CONNECTICUT

1. Verizon is the incumbent local exchange carrier in two small areas of Connecticut – Greenwich and Byram – in which Verizon serves approximately 60,000 access lines. Although Verizon's local service territory is extremely small, it has already managed to attract local competition. Indeed, competitors in Greenwich and Byram, are providing service to both residential and business customers using each of the three paths of competitive entry contemplated by the 1996 Act: facilities-based service, unbundled elements, and resale.

a. *CLECs are using all three modes of competitive entry.* Competitors are serving more than 2,500 lines in Greenwich and Byram: approximately 550 lines over their own facilities, and nearly 2,000 lines through resale.<sup>1</sup> Competitors are serving approximately 285 customers using unbundled loops (not including those used to provide DSL service). Every single item on Section 271's competitive checklist is being used by multiple CLECs in Greenwich and Byram. *See Table 2.*

b. *CLECs are serving both residential and business customers.* One competitor in Greenwich and Byram – Network Plus – serves residential customers over its own facilities and through resale. An additional competitor – Cablevision – serves business customers in Greenwich and Byram over its own facilities. At least four competitors – WorldCom, CTC, Network Plus, and New England Voice & Data – serve business customers through resale.

Table 1. Competitor Access Lines in Greenwich/Byram	
<b><i>Facilities-Based</i></b>	
Ported Numbers	550
Business*	520
Residential*	**** ****
<b><i>Resale</i></b>	
Business Resale Lines	2,000
Residential Resale Lines	**** ****
<b><i>UNE</i></b>	
Unbundled Loops (not including DSL-capable)	285
*Based on combination of non overlapping ported numbers, unbundled loops, and directory listings.	

<sup>1</sup> The information in this report is as of February 2001 unless otherwise indicated. Totals do not always equal the sum of the parts due to rounding.

### A. Overview of Competition

2. Authorized Local Exchange Competitors. More than 100 CLECs are licensed to provide both facilities-based and resale service in Greenwich and Byram. *See* Exhibit 1. Since 1996, Verizon has entered into, and the Connecticut Department of Public Utility Control (Connecticut DPUC) has approved, more than 30 facilities-based interconnection agreements with CLECs. *See* Exhibit 2. Three more interconnection agreements with CLECs are currently pending before the Connecticut DPUC.

3. Facilities-Based Local Exchange Competition. As of February 2001, competitors had ported approximately 550 telephone numbers from Verizon to their own switches in order to serve customers in Greenwich and Byram. In addition, as of February 2001, competitors have obtained 15 NXX codes in Greenwich to serve these customers. Competitors have deployed at least four voice switches that are programmed with NXX codes to serve customers in Greenwich and Byram. As of February 2001, competitors have obtained more than 25 collocation arrangements in Verizon's central offices serving Greenwich and Byram, giving them access to all of Verizon's access lines in Connecticut.

4. Use of Unbundled Network Elements. As of the end of February 2001, Verizon had provided a total of approximately 635 unbundled loops to at least seven different competitors. All of these loops were provided on a stand-alone basis, and more than 350 of them were DSL-capable loops. In addition, Verizon has provided four unbundled dedicated local transport facilities to CLECs in Greenwich and Byram. No CLEC has ordered unbundled local switching, either on a stand-alone basis or in combination with other elements.

5. Resale. As of February 2001, eight competitors in Connecticut were reselling approximately 2,000 lines, including approximately \*\*\*\* residential lines. Three companies resell more than 240 lines each.

**Table 2. Competitor Use of Checklist Items**

Interconnection	1 CLEC; more than 1,000 trunks 6 other CLECs with approximately 770 trunks carrying CT-NY local traffic 15 CLECs; more than 25 collocation nodes
Poles, Ducts, Conduits	3 CLECs/OCCs; more than 8,300 pole attachments* 5 CLECs/OCCs; approximately 90,000 feet* of conduit
Local Loops	7 CLECs; approximately 635 loops
Local Transport	4 dedicated transport facilities
DA/Operator Services	8 CLECs with DA** 8 CLECs with OS**
Directory Listings	6 CLECs; approximately 460 listings
NXX Codes	11 CLECs; 15 NXX codes
Databases and Signaling	1 CLEC**
Number Portability	2 CLECs; 550 numbers via LNP
*Includes poles and conduit provided to cable operators and other entities in addition to CLECs. **Agreement in place.	

## B. Profiles of Competitors

6. Network Plus. Network Plus provides local and DSL services in the northeastern and southeastern regions of the United States.<sup>2</sup> Network Plus received authorization to provide local exchange services statewide in Connecticut on October 1, 1998.<sup>3</sup> Network Plus provides facilities-based service to approximately \*\*\*\* business and at least \*\*\*\* residential customer(s), and resells approximately \*\*\*\* business and at least \*\*\*\* residential line(s) in Greenwich and Byram.<sup>4</sup> Network Plus has ported approximately \*\*\*\* number(s) from Verizon, including \*\*\*\* residential numbers, and is using more than \*\*\*\* unbundled analog loop(s) to provide local service to business and residential customers.

7. Cablevision. Cablevision is the incumbent cable operator in Greenwich and Byram as well as 25 other communities in Connecticut.<sup>5</sup> Cablevision provides facilities-based business service through a wholly owned subsidiary, Cablevision Lightpath, which received authorization to provide local service in the Stamford, Bridgeport, Torrington, and New London “multi-exchange market groupings” (which includes Greenwich and Byram) in July 1996,<sup>6</sup> and to provide statewide service in April 1998.<sup>7</sup> Cablevision Lightpath provides facilities-based business service in Greenwich and Byram. The company operates a switch in Norwalk, CT that serves Greenwich and Byram.<sup>8</sup> Cablevision Lightpath has also stated that it intends to provide residential service in Greenwich and Byram.<sup>9</sup> Cablevision Lightpath has been assigned \*\*\*\* NXX code(s) and serves business customers having provided at least \*\*\*\* business line(s) in Greenwich and Byram.

8. AT&T. AT&T is the largest facilities-based CLEC in the U.S, as well as the nation’s largest long distance carrier and cable operator. AT&T has been authorized to provide

<sup>2</sup> Network Plus, 1999 10K at 2 (SEC filed Mar. 30, 2000).

<sup>3</sup> See *Application of Network Plus to Expand Its Certificate of Public Convenience and Necessity*, Docket No. 98-08-20, Decision (Oct. 1, 1998).

<sup>4</sup> Network Plus operates a Lucent 5ESS switch in New York. *CLEC Report 2001*, Ch. 9 – Network Plus at 7. The company operates a branch sales office in Norwalk. Network Plus, *Locations*, <http://www.networkplus.com/corporate/locations.htm>.

<sup>5</sup> See Cablevision, *Cable Television Operations*, <http://www.cablevision.com/cvhome/frame/fcatv.htm>.

<sup>6</sup> See *Application of Cablevision Lightpath-CT, Inc. for a Certificate of Public Convenience and Necessity*, Docket No. 95-07-19, Decision (July 17, 1996).

<sup>7</sup> See *Application of Cablevision Lightpath – CT, Inc. To Expand Its Certificate of Public Convenience and Necessity*, Docket No. 98-03-07, Decision (Apr. 23, 1998).

<sup>8</sup> See *LERG*; see also New Paradigm Resources Group, Inc., *CLEC Report 2001*, Ch. 9 – Cablevision Lightpath at 6 (13th ed. 2001) (“*CLEC Report 2001*”).

<sup>9</sup> Comments of Cablevision Lightpath at 2-3, *Application of New York Telephone Company Pursuant to Section 271 of the Telecommunications Reform Act of 1996*, Docket No. 97-01-23 (CT DPUC filed Aug. 22, 2000) (“intends to provide facilities-based services to residential consumers in BA-NY’s Connecticut service area. Lightpath’s investments and participation in [Connecticut DPUC] proceedings demonstrate that it has made a long-term commitment to providing competitive service in the Connecticut local market, including residential services in BA-NY’s service area.”).

local service statewide since February 28, 1996.<sup>10</sup> In July 1998, AT&T completed the acquisition of TCG,<sup>11</sup> a facilities-based competitor in Connecticut since 1994.<sup>12</sup> AT&T has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich.<sup>13</sup> AT&T operates a Nortel DMS-500 switch in White Plains, NY that is programmed with NXX codes to serve both Greenwich and Byram,<sup>14</sup> and a switch in Albany, NY that is programmed with NXX codes to serve Greenwich.<sup>15</sup>

9. WorldCom. WorldCom is the largest provider of Internet services in the United States, the second largest long-distance carrier, and one of the two largest CLECs. WorldCom received authorization to provide statewide local service in Connecticut on June 28, 1995.<sup>16</sup> WorldCom provides resold business service in Greenwich and Byram.<sup>17</sup> WorldCom resells more than \*\*\*\* business line(s).

10. CTC. CTC Communications is a rapidly growing competitive local exchange carrier utilizing next generation technology to provide converged voice, data, Internet and video services for medium and larger-sized businesses in the northeast.<sup>18</sup> CTC was authorized to resell local service statewide in Connecticut on April 8, 1998.<sup>19</sup> It was granted an extension of its CPCN to provide facilities-based service on March 29, 2000.<sup>20</sup> CTC provides more than \*\*\*\* resold business line(s) in Greenwich and Byram.

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<sup>10</sup> See *Application of AT&T Communications of New England To Expand the Authority Granted in Its Certificate of Public Convenience and Necessity*, Docket No. 96-01-06, Decision (Feb. 28, 1996).

<sup>11</sup> AT&T News Release, *AT&T Completes TCG Merger* (July 23, 1998).

<sup>12</sup> TCG received authorization to provide statewide local service in Connecticut on July 13, 1994. See *Application of TCG America Inc. for a Certificate of Public Convenience and Necessity*, Docket No. 93-11-19, Decision (July 13, 1994).

<sup>13</sup> Collocation arrangements in the Port Chester, NY central office are included because they can be used to serve Byram.

<sup>14</sup> See Bellcore, *Local Exchange Routing Guide* (Dec. 1999) (“*LERG*”); see also *CLEC Report 2001*, Ch. 9 – AT&T at 23.

<sup>15</sup> See *LERG*; see also *CLEC Report 2001*, Ch. 9 – AT&T at 19.

<sup>16</sup> This is the date on which MCI Metro, which WorldCom acquired in September 1998, received authority to provide statewide local service. See *Petition of MCI Metro Access Transmission Services Inc., to Expand Authority Granted in Its Certificate of Public Convenience & Necessity to Include the Provision of Local Exchange Services in Connecticut*, Docket No. 95-08-12, Decision (Sept. 13, 1995). WorldCom separately received authority on February 28, 1996. *Application of WorldCom to Expand Its Authority to Provide Local Exchange Services*, Docket No. 96-01-18, Decision (Feb. 28, 1996).

<sup>17</sup> WorldCom operates a network in Stamford which has ten buildings on-net, and is served by Nortel DMS-500 and Nortel DMS-100 switches. *CLEC Report 2001*, Ch. 9 – WorldCom at 15.

<sup>18</sup> CTC Communications Press Release, *December Quarter and Year Fiscal Year End 2000 Investor Conference Call* (Feb. 14, 2001).

<sup>19</sup> See *Application of CTC Communications Corporation for a Certificate of Public Convenience and Necessity*, Docket No. 97-12-09, Decision (Apr. 8, 1998).

<sup>20</sup> *Application of CTC Communications Corp. to Expand Its Certificate of Public Convenience and Necessity*, Docket No. 99-11-23, Decision (Mar. 29, 2000).

11. DSL Providers. Several data CLECs have deployed DSL services in Greenwich and Byram. Covad has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich and approximately \*\*\*\* unbundled DSL loop(s) (including ISDN loops). DSL.net has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich and \*\*\*\* unbundled DSL loop(s). Rhythms has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich and approximately \*\*\*\* unbundled DSL loop(s). Network Access Solutions (“NAS”) has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich and more than \*\*\*\* unbundled DSL loop(s).

12. Other Potential Competitors. There are numerous competitors that have interconnection agreements with Verizon in Greenwich and Byram and how have indicated that they intend to provide competitive local service in the future, and that have taken some concrete steps toward doing so.

- Sprint is the nation’s third largest long distance carrier, one of the largest wireless carriers and Internet backbone operators, and the sixth largest incumbent local exchange carrier. Using Sprint ION, its broadband platform, Sprint plans to deliver local, long-distance, and data services nationwide to business and residential customers.<sup>21</sup> Sprint has emphasized that it “entered into this interconnection agreement with BA-NY in good faith in order to provide local exchange service in BA-NY’s Connecticut service territory.”<sup>22</sup> It has obtained \*\*\*\* NXX code(s) in the Greenwich central office, and \*\*\*\* physical collocation arrangement(s) from Verizon New York.

- Advanced TelCom Group (ATG) is a facilities-based CLEC that provides integrated local, long-distance, and data services, including DSL, to small- and medium-sized business customers, home-based businesses, and telecommuters.<sup>23</sup> ATG’s interconnection agreement with Verizon New York was approved on March 29, 2000.<sup>24</sup> ATG has obtained \*\*\*\* physical collocation arrangement(s) in Greenwich from Verizon New York, and \*\*\*\* NXX code(s). ATG has announced plans to provide business service in Greenwich and is in the process of installing a Lucent 5ESS switch.<sup>25</sup>

- PaeTec Communications is “an integrated communications provider offering local, domestic, and international long-distance services, high-speed Internet access, eCommerce, and other data services to medium, and large-sized businesses, colleges and universities, hospitals, governmental organizations, and affinity groups.”<sup>26</sup> The company’s vision is “to be the nation’s most customer, and employee oriented integrated communications

<sup>21</sup> Sprint Corp., 2000 Annual Report at 14-18.

<sup>22</sup> Letter from Jennifer A. Duane, Attorney, State Regulatory Affairs/Northeast, Sprint, to Louise E. Rickard, Acting Executive Secretary, Connecticut DPUC, Docket No. 97-01-23 (Aug. 22, 2000).

<sup>23</sup> Advanced TelCom Group, Inc., *Meet ATG*, [http://www2.callatg.com/index\\_sub1.html](http://www2.callatg.com/index_sub1.html).

<sup>24</sup> *Application of Bell Atlantic-New York for an Interconnection Agreement with Advanced TelCom Group*, Docket No. 00-02-16, Decision (Mar. 29, 2000).

<sup>25</sup> Advanced TelCom Group, Inc. Press Release, *ATG’s Eastern Seaboard Expansion Goes Into High Gear in Connecticut and Long Island* (Jan. 15, 2000).

<sup>26</sup> PaeTec.com, *Corporate: Company Profile & History*, <http://www.paetec.com/index.html>.

provider.”<sup>27</sup> PaeTec was authorized to provide local services statewide in Connecticut on November 17, 1999.<sup>28</sup> PaeTec provides business service in Hartford, Stamford, New Haven, and Southern Connecticut using switches located in Albany and Manhattan.<sup>29</sup> PaeTec has obtained \*\*\*\* NXX code(s) to serve Greenwich, though it has not begun providing service there yet.<sup>30</sup>

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<sup>27</sup> PaeTec.com, *Corporate: Company Profile & History*, <http://www.paetec.com/index.html>.

<sup>28</sup> See *Application of PaeTec Communications, Inc. For A Certificate Of Public Convenience And Necessity*, Docket. No. 99-07-13, Decision (Nov. 17, 1999).

<sup>29</sup> See *CLEC Report 2001*, Ch. 9 – PaeTec Communications at 11.

<sup>30</sup> PaeTec has not obtained any listings in Verizon’s white pages, or any ported numbers.

**Exhibit 1. Authorized Competitive Local Exchange Carriers**

1-800-RECONEX, Inc. f/k/a Sterling Int'l Funding	Essential.Com, Inc.	OnFiber Carrier Services, Inc.
2nd Century Communications, Inc.	Essex Communications, Inc.	Onsite Access Local LLC
@link Networks f/k/a Dakota Services Ltd.	eVulcan, Inc.	Optimum Global Communications, Inc.
Adelphia Business Solutions of CT, Inc. f/k/a Hyperion	Excel Telecommunications, Inc.	Pae Tec Communications, Inc.
Advanced Telecom Group, Inc.	EZTalk Communications, LLC	Partner Communications Group, LLC
Allied Riser of CT, Inc.	Fair Point Comm. Corp. f/k/a MJD TeleChoice Corp.	Pathnet Operating, Inc.
American Fiber Network, Inc.	GE Capital Communications et al	Picus Communications, LLC
Arbros Communications Licensing Company, N.E.	Global Crossing Local Svcs f/k/a Frontier Local Svcs	Precision Power, Inc.
Atlas Communications, Ltd.	Global Crossing Telemgmt. f/k/a Frontier Telemgmt.	Preferred Carrier Services
AT&T Communications of New England, Inc.	Global NAPS, Inc.	RCN L.D. f/k/a Commonwealth L.D.
A.R.C. Networks, Inc. d/b/a Info-Highway	Global Telephone Corporation	RCN Telecom Services of CT, Inc.
BellSouth Long Distance, Inc.	Group Long Distance, Inc.	RECONEX, Inc.
Blink Services, Inc.	Intellicall Operator Services, Inc.	Rhythms Links, Inc. f/k/a ACI Corp.
BretteCom, Inc.	Intercontinental Comm. Group d/b/a Fusion Telecom	SBC Advanced Solutions, Inc.
Broadband Office Communications, Inc.	Intermedia Communications, Inc	ServtSense.com, Inc.
BroadRiver Comm. f/k/a PurePacket Comm.	International Telecom, Ltd.	SouthNet Telecomm Services, Inc.
Brooks Fiber Communications of CT, Inc.	International Telephone Group, Inc.	Sprint Communications Co., L.P.
Cablevision Lightpath of CT, Inc	IP Voice Communications, Inc.	Supra Telecomm. and Information Sys., Inc.
Capital Telecommunications, Inc. (CTI)	JATO Operating Two Corp.	Talk.com Holding Corp. f/k/a Tel-Save, Inc.
CAT Communications International, Inc.	KMC Telecom V, Inc.	TCG CT f/k/a TCG America, Inc.
CCCCT, Inc. d/b/a Connect!	LCI International Telecom Corp.	Teleglobe USA, Inc.
Choctaw Comm. d/b/a Smoke Signal Comm.	LDM Systems, Inc.	Teleglobe Bus. Solutions f/k/a Telco Hldgs. d/b/a Dial & Save
Choice One Communications of CT, Inc.	Level 3 Communications, LLC	Telergy Network Services, Inc.
CI 2	LGM Communications, Inc.	Teligent Services, Inc.
Cleartel Communications, Inc.	Lightyear Telecomm. f/k/a UniDial f/k/a Metracom	Teltrust Comm. Svcs, Inc. d/b/a Teltrust/TCS
Comm South Companies, Inc.	Log On America	Total Tel, Inc. f/k/a TotalTel USA Comm.
CommcoTec Corporation	Maxcess, Inc.	TOTALink of CT, LLC
Computer Business Sciences, Inc.	MCImetro f/k/a Access Transmission Services	Trans National Communications International, Inc.
CT Telephone and Communication Systems, Inc.	Metropolitan Comm. of CT, Inc. d/b/a MetTel	Transbeam, Inc.
CoreComm CT, Inc.	Mode 1 Communications, Inc.	U S WEST Interprise America, Inc.
Cox CT Telcom, L. L.C. d/b/a Cox Communications	Mohegan Telecommunications, LLC	United States Advanced Network, Inc.
CRG International d/b/a Network One	Mpower Comm. Corp. f/k/a MGC Comm., Inc.	United States Telecommunications, Inc.
CTC Communications Corp.	NET-tel Corp. d/b/a Four Seasons Long Distance	Universal Access, Inc.
DIECA Communications, Inc.	Net2000 Comm. Services	US LEC Communications, Inc.
DPI-Teleconnect, L.L.C.	Network Plus, Inc.	U.S. TelePacific Corp. d/b/a TelePacific Comm.
DSLnet Communications, LLC	New Edge Networks	Williams Local Network, Inc.
Eagle Communications, Inc.	New York Teleconnect d/b/a New England Teleconnect d/b/a Cellular Rentals	Yipes Transmission, Inc.
Easton Telecom Services, Inc.	OmniCall, Inc.	Z-Tel Communications, Inc.
Enkido, Inc.	Omniplex Communications Group, L.L.C.	ZipCall L.D. f/k/a Message Center L.D.
Enron Broadband Services, Inc.	One Star Long Distance	



<b>Exhibit 2. Interconnection Agreements with CLECs as of March 2001</b>		
<b>Carrier</b>	<b>Date Filed</b>	<b>Date Approved</b>
@link Networks (Dakota Services Limited)	06/12/98	07/23/98
A.R.C. Networks	09/27/00	11/29/00
ACC National Telecom (ANTC, owned by AT&T)	07/28/98	09/02/98
Adelphia Business Solutions (Hyperion)	03/23/00	05/10/00
Advanced TelCom Group	02/17/00	03/29/00
AT&T	11/11/99	04/19/00
Broadband Office Communications	07/31/00	09/13/00
Cablevision Lightpath	08/14/98	10/01/98
Computer Business Sciences	09/13/99	12/01/99
Covad	12/18/98	02/26/99
CTC	03/08/01	
C-TEC (RCN)	08/09/97	09/24/97
DSLnet	05/13/99	07/21/99
Global Crossing	05/26/00	09/06/00
HarvardNet	07/11/00	01/24/01
KMC Telecom V	03/08/01	
Log On America	01/21/00	06/14/00
MCImetro	04/28/98	06/03/98
Metromedia Fiber Network	06/25/99	08/04/99
Metropolitan Telecommunications (MetTel)	09/27/00	11/29/00
MGC Communications (Mpower)	07/11/00	12/27/00
MVX.Com	07/31/00	09/27/00
Network Access Solutions	11/19/98	12/23/98
Network Plus	02/09/01	03/21/01
New Edge Networks	03/23/00	06/14/00
OnSite Access Local	03/08/01	
PurePacket Communications	09/27/00	01/24/01
Rhythms Links (ACI)	10/27/99 11/20/00	01/26/00 04/04/01
Sprint	12/20/99	02/02/00
Talk.Com Holdings	07/31/00	09/13/00
TCI Telephony, owned by AT&T	06/11/97	07/10/97
US West Interprise	05/13/99 11/30/99	07/21/99 04/19/00
WinStar	09/17/97	10/28/97
xDSL Networks	06/29/99	08/18/99